

**Comments on the DEIS for BLM's Western Oregon Plan
Revision**

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The extended comments submitted by Hope Robertson in response to the Draft Environmental Impact Statement (DEIS) for the Western Oregon Plan Revision (WOPR) represent my views as well. I have the following comments to add to her expert study.

The changes proposed in the DEIS for WOPR that most concern me are (1) the relaxation of logging regulations in Timber Management Areas and (2) the establishment of off-highway-vehicle (OHV) emphasis areas. In both cases, radical changes are proposed whose justifications are weak or illogical.

Timber Management. Clear-cutting of old-growth timber would double under the favored Alternative 2 of WOPR. The defense of this proposal in the DEIS runs roughly this way: Earlier models showing that sustained timber yields, with appropriate environmental protections, can be maintained at the levels established in the 1990s Northwest Forest Plan are now wrong. New models cited in the DEIS (but with their scientific bases not cited or carefully evaluated) say that clear-cutting at vastly increased levels and drastic reductions in riparian reserve areas are now acceptable. But even if not acceptable, the BLM must allow this much logging to meet its statutory obligations. What about protection of endangered species, the water supply, fish habitat; in effect, the entire forest ecosystem? Well, the law requires logging above all!

The sheer audacity of this reasoning aside, the appeals to modelling scattered throughout the DEIS provide no critical analysis of scientific modelling, and no discussion of scientific results that may contradict the pre-determined outcome. If you've made up your mind what you're going to do, you can always find *some* scientific justification for it. The DEIS ignores the substantial and growing literature supporting a new kind of forest management that involves extensive thinning and small-diameter logging, with extended riparian habitat protection.

The counties of Western Oregon would be ill-served by a return to dependence on the notoriously volatile, large-diameter timber harvests for their funding. Harvesting small-diameter trees from second-growth forest and tree

farms is a much better alternative that will lower fire risks, meet the present needs for timber production, and provide predictable funding for counties. The DEIS examines none of the possibilities that the recent failures to meet production targets may be a matter of cyclic demand or other causes, not litigation.

The final DEIS should include an additional action alternative that starts with the Northwest Forest Plan (NWFP), preserving its extensive evidence-based reasoning and cooperative decision-making methods, and proposing modifications that can be shown to increase timber production within the context of the ecological protections so carefully worked out for the original NWFP.

Off Highway Vehicles The BLM website link to Recreation reads, in part, as follows:

Hiking, camping, hunting, fishing and boating are just some of the many activities to enjoy on your public lands.

It's clear why Off-Highway-Vehicle (OHV) usage is not included among these bucolic examples; it is incompatible with *all* of them.

The WOPR proposes that statewide nearly 140,000 acres be designated as "OHV Emphasis Areas"—with 100,000 of those acres concentrated in the Medford BLM district! Such areas would be "open, but not recommended" for hiking, horseback riding, etc., for understandable safety reasons. In various open houses and other forums, BLM representatives have indicated that the 13 areas proposed for the Medford District, are only to be "studied": some would not be chosen. But nowhere in the WOPR DEIS are the criteria for such studies established. The public is asked for "input" but with no indication of how that input will be dealt with. (The director of the Medford Office told me that it was up to him to decide.)

Glossed over by omission in WOPR is the fact that OHV riders are to be offered their emphasis areas, *but they will not be limited to those areas*. Nowhere is there a proposal for restricting OHV riders from other BLM lands. The effect of the OHV Emphasis Area designations would be—under the "not recommended" advisory—to rule-out from a large chunk of BLM lands those other usages listed on the BLM website. Table 53 of the DEIS shows that some 160,000 acres "Open" or "Limited to existing roads and trails" under the No-Action Alternative would be reduced to zero under the Action Alternatives, but that 46,371 acres now "Closed" would be reduced to 42,298 acres "Closed" under the Action Alternatives. Are the zeroed-out

alternatives open or closed to OHV travel? The DEIS does not make this clear.

By the action of a single BLM district office, the Rogue Valley would be turned into a nationally-recognized mecca for OHVs that include responsible riders, but also include noisy, sometimes wildly aggressive riders. At a BLM open house on the subject, I heard some OHV riders express considerable ambivalence about the expected crowds. One rider told me that he feared the recklessness of out-of-area riders would drive him from his solitary enjoyment of Anderson Butte were that to be an Emphasis area. His preference was to leave the status quo in effect. Most OHV riders are responsible and care about the natural environment that they are enjoying, but it takes only a very few irresponsible riders to do terrible damage to the environment and to endanger other riders and other categories of users.

Clearly enforcement would be a great challenge were these OHV areas to be established, but the issue is not addressed in the DEIS. Worst-case scenarios would need to be analyzed. Given the record of occasional mob rule—e.g., recently in Utah, with hundreds of riders intimidating a small cadre of wardens—the demands for adequate policing will be high indeed. Where will the substantial funds come from? The DEIS does not address this question.

Jackson County Commissioner Dave Gilmour's suggestion that three of the 13 proposed sites—Elderberry Flats, Ferris Gulch, and Salt Creek, I believe—may be plausible areas for OHV Emphasis. But even these sites are questionable, and may be opposed by the neighboring residents. All the other proposed areas are inappropriate for a variety of reasons, including conflict with other recreational activities, substantial private in-holdings, steep and narrow roads, endangered-species habitats, etc.

The OHV section of the DEIS is a reckless, outsized plan that would create far more problems than it purports to solve. It responds little or at all to the need for management of OHV usage on BLM lands.

The BLM should plan anew, starting with no pre-designated OHV areas, and should follow its own guidelines by developing a Travel Management Plan. This should include pre-notification of proposed regulation changes to neighboring land owners. In addition, due consideration should be given to the establishment of Emphasis Areas for the quiet uses emphasized in the BLM Recreation Web Site, such as boating, hiking, horseback riding, etc., with guaranteed protection from the noise and danger of OHV use.